

EXHIBIT D

From: [Tomezsko, Sara B.](#)
To: "Gelfand, Shira Z."; Jumper, Maya
Cc: [Gage, Kenneth W.](#); [Greene, Cara](#); [Cedar, Christine](#)
Subject: RE: Google/Rowe - Interrogatories and Other Follow Up [IWOV-OGDMS.FID701188]
Date: Thursday, December 17, 2020 5:10:42 PM
Attachments: [image001.png](#)

Hi Shira –

Below is Google's position with respect to the specific documents plaintiff will submit with her pre-motion letter on the comparator discovery:

GOOG-ROWE-00017439-00017440 - Google does not waive confidentiality
GOOG-ROWE-00056990-00057014 - Google does not waive confidentiality
GOOG-ROWE-00059686-00059687 – Google will waive confidentiality for the limited purpose of this filing
GOOG-ROWE-00060436 – 00060437 – Google does not waive confidentiality
GOOG-ROWE-00058806 - Google will waive confidentiality for the limited purpose of this filing
Wilson Tr: 145:10-14, 154:24-159:8, 119:3-19 - Google will waive confidentiality for the limited purpose of this filing
Eryurek Tr: 116:2-120:16, 86:4-6 - Google will waive confidentiality for the limited purpose of this filing

Let me know if I am missing anything.

**PAUL
HASTINGS**

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From: Gelfand, Shira Z. <sgelfand@outtengolden.com>
Sent: Thursday, December 17, 2020 4:32 PM
To: Tomezsko, Sara B. <saratomezsko@paulhastings.com>; Jumper, Maya <MJumper@outtengolden.com>
Cc: Gage, Kenneth W. <kennethgage@paulhastings.com>; Greene, Cara <ceg@outtengolden.com>; Cedar, Christine <christinecedar@paulhastings.com>
Subject: [EXT] RE: Google/Rowe - Interrogatories and Other Follow Up [IWOV-OGDMS.FID701188]

Thanks, Sara. We intend to file by 6PM. If we haven't heard from you by then we will proceed as if all of the exhibits are confidential and send them under separate cover to the court.

From: Tomezsko, Sara B. <saratomezsko@paulhastings.com>
Sent: Thursday, December 17, 2020 2:26 PM
To: Jumper, Maya <MJumper@outtengolden.com>; Gelfand, Shira Z. <sgelfand@outtengolden.com>
Cc: Gage, Kenneth W. <kennethgage@paulhastings.com>; Greene, Cara <CEG@outtengolden.com>; Cedar, Christine <christinecedar@paulhastings.com>
Subject: RE: Google/Rowe - Interrogatories and Other Follow Up [IWOV-OGDMS.FID701188]

Hi Maya – This looks fine. Signed copies attached. I did make one change to the stipulation before signing to replace my name with Caitlin's in the signature block.

Hope to be able to respond with Google's position on the confidentiality of the documents you intend to file with your pre-motion letter today; just waiting on client confirmation.

**PAUL
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